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*Attorneys for Plaintiffs Emmanuel Cornet,
Justine De Caires, Grae Kindel, Alexis Camacho,
and Jessica Pan, on behalf of themselves
and all others similarly situated*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

EMMANUEL CORNET, JUSTINE DE
CAIRES, GRAE KINDEL, ALEXIS
CAMACHO, AND JESSICA PAN, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

TWITTER, INC.

Defendant.

Case No. 3:22-cv-06857-JD

**PLAINTIFFS' ADMINISTRATIVE
MOTION FOR THE COURT TO HEAR
PLAINTIFFS' MOTION FOR LEAVE TO
FILE SECOND AMENDED COMPLAINT
TOGETHER WITH THEIR
EMERGENCY MOTION FOR
PROTECTIVE ORDER**

N.D. Cal. Civil Local Rule 6-3

ACTION FILED: November 3, 2022

PLAINTIFFS' ADMINISTRATIVE MOTION FOR THE COURT TO HEAR PLAINTIFFS' MOTION
FOR LEAVE TO FILE SECOND AMENDED COMPLAINT TOGETHER WITH
THEIR MOTION FOR PROTECTIVE ORDER

1 Plaintiffs hereby respectfully request, pursuant to Local Rule 6-3, that their Motion for
2 Leave to File Second Amended Complaint (Dkt. 28) be heard to together with their Emergency
3 Motion for a Protective Order (Dkt. 7) on December 8, 2022, at 3:00 PM PST.

4 Plaintiffs filed their Motion for Leave to File Second Amended Complaint (Dkt. 28) on
5 November 23, 2022. As Plaintiffs explained in their Reply in Support of their Emergency
6 Motion for a Protective Order (Dkt. 30 at 2, 5-6), Twitter has argued that the Emergency Motion
7 should be denied because the claims in the case should be compelled to arbitration. While
8 Plaintiffs disagree that the possibility that claims may be ultimately compelled to arbitration
9 should have any bearing on the appropriateness of the Court granting the protective order that
10 they have sought, in order to mitigate this issue, Plaintiffs have sought to amend their complaint
11 to add named plaintiffs who opted out of Twitter's arbitration agreement. See Proposed Second
12 Amended Complaint, Dkt. 28-1. With these plaintiffs added to the case, there is no question that
13 the entire case would be disposed of through an order compelling arbitration.
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15 As such, Plaintiffs submit that the Court should hear both of Plaintiffs' pending motions
16 together. Moreover, because this case is at such an early stage, Plaintiffs submit that amendment
17 should be freely granted.

18 Plaintiffs have conferred with Twitter regarding whether it will assent to their motion to
19 amend, but Twitter has not yet indicated whether or not it will assent.
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Respectfully submitted,

EMMANUEL CORNET, JUSTINE DE CAIRES,
GRAE KINDEL, ALEXIS CAMACHO, AND
JESSICA PAN, on behalf of themselves and all
others similarly situated,

By their attorneys,

/s/ Shannon Liss-Riordan
Shannon Liss-Riordan, SBN 310719
Thomas Fowler (*pro hac vice* forthcoming)
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Dated: November 30, 2022

CERTIFICATE OF SERVICE

I, Shannon Liss-Riordan, hereby certify that a true and accurate copy was served on all
counsel of record for Defendant on November 30, 2022, via filing on the Court's CM/ECF
system.

/s/ Shannon Liss-Riordan
Shannon Liss-Riordan